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It is our opinion the Com-Ed Blue Book and DG book should be used as <u>Guidelines</u> for interconnection, as stated in the introduction of both books 2001 Edition.

However there are circumstances where alternative interconnect methods should be used, especially where the alternative method is technically equivalent and is lower in cost than the typical method outlined in the Blue Book and DG Book.

Example I

Rock River Water Reclamation District (RRWRD) in Rockford, Illinois
Due to an older Com-Ed sub-station having to be upgraded, the equipment and labor cost to
install reclosing protection at the sub-station (in the event of a fault on an Edison feeder) was
\$223,000. This total cost had to be borne by the customer as the interconnection fee. An
alternative was presented to Edison engineers and was technically approved; yet was discarded
as "not the standard", "not the Blue Book method".

The alternative method of protective relaying that would have been installed at the customer's service switchgear (not Edison's) cost of \$50,000.

The relaying alternative would trip the cogeneration system off line in the event of a fault on Com-Ed's system within 0.1167 seconds, and provide adequate protection to the customer's equipment.

Example II

The Blue Book allows a parallel closed transition of generation systems with Edison for up to 60 seconds when a customer selects to transfer his load and operate independent of Edison (ESP during peak hours). When this was proposed as an option for RRWRD, Edison responded that they could do this only if the transition time is 10 cycles, i.e. 0.1667 sec. This very limited transition time would impose severe thermal and mechanical shock to RRWRD equipment daily.

